Snell & Wilmer LLW OFFICES 3883 Howard Hughes Parkway, Suire 1100 Las Vegas, Nevada 89169 702.784.5200	1 2 3 4 5 6 7	Robin E. Perkins, Esq. (NV Bar No. 9891) Adam Tully, Esq. (NV Bar No. 13601) SNELL & WILMER L.L.P. 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Telephone: (702) 784-5200 Facsimile: (702) 784-5252 Email: rperkins@swlaw.com atully@swlaw.com Attorneys for U.S. Bank National Association		
	8	UNITED STATES DISTRICT COURT		
	9	DISTRICT OF NEVADA		
	10	U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR CREDIT SUISSE FIRST	Case No. 2:17-cv-01899-RFB-CWH	
	11 12	BOSTON MORTGAGE SECURITIES CORP., CSMC MORTGAGE-BACKED PASS-	PLAINTIFF'S MOTION TO EXTEND TIME TO FILE	
	13	THROUGH CERTIFICATES, SERIES 2006-7;	(1) REPLY IN SUPPORT OF	
	14	Plaintiff,	COUNTERMOTION FOR SUMMARY JUDGMENT, AND	
	15	vs.	(2) OPPOSITION TO SFR INVESTMENT POOL 1, LLC'S	
	16	SFR INVESTMENTS POOL 1, LLC, a Nevada limited-liability company;	COUNTER MOTION FOR RELIEF UNDER FED. R. CIV. P. 56(d)	
	17	SOUTHERN HIGHLANDS COMMUNITY ASSOCIATION, a Nevada non-profit	[FIRST REQUEST]	
	18	corporation; ALESSI & KOENIG, LLC, a Nevada limited-liability company;		
	19	Defendants.		
	20			
	21	Pursuant to Federal Rule of Civil Procedure ("FRCP") 6(b) and Local Rule IA 6-1,		
	22	Plaintiff U.S. Bank National Association, as Trustee for Credit Suisse First Boston Mortgage		
	23	Securities Corp., CSMC Mortgage-Backed Pass-through Certificates, Series 2006-7 ("U.S.		
	24	Bank") hereby requests that this Court extend two briefing deadlines by thirty days. First, U.S.		
	25	Bank seeks a thirty day extension of time to file a reply in support of its Countermotion for		
	26	Summary Judgment [ECF No. 26], which Defendant SFR Investments Pool 1, LLC ("SFR")		
	27	responded to on March 5, 2018 [ECF No. 39]	("Response"). The current deadline for U.S.	

Bank's reply to SFR's Response is March 19, 2018, and U.S. Bank respectfully requests that the

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

deadline be extended to April 18, 2018. Second, U.S. Bank seeks a thirty day extension of time to file a response to SFR's Counter Motion for Relief under Fed. R. Civ. P. 56(d) [ECF NO. 40] ("Counter Motion"). The current deadline for U.S. Bank's response to SFR's Counter Motion is March 19, 2018, and U.S. Bank respectfully requests that the deadline be extended to April 18, 2018.

MEMORANDUM OF POINTS AND AUTHORITIES

Federal Rule of Civil Procedure ("FRCP") 6(b) and Local Rule IA 6-1 permit this Court, upon a showing of good cause, to extend the time for filing an opposition. Here, good cause exists for the extension requested.

U.S. Bank recently received multiple substantive briefings and there is substantial discovery ongoing as a result of the upcoming close of discovery on May 5, 2018. On February 28, 2018 defendant Southern Highlands Owners Association ("Southern Highlands") filed a Motion for Judgment on the Pleadings [ECF No. 35]; on March 5, 2018 Sothern Highlands filed a response to U.S. Bank's Countermotion for Summary Judgment [ECF No. 38]; and on March 5, 2018 SFR filed its Response [ECF No. 39] and its Counter Motion [ECF No. 40]. Additionally, SFR served written discovery on U.S. Bank on March 12, 2018; and there are a number of depositions that have been recently set which the parties require time to prepare for, take, and defend.

Accordingly, U.S. Bank seeks this extension of time to file its reply to SFR's Response and its response to SFR's Counter Motion.

Southern Highlands and U.S. Bank have already stipulated to an extension of time for U.S. Bank's responses to Southern Highland's filings. [ECF No. 44]. While SFR would not stipulate to a similar extension, SFR's counsel has represented to U.S. Bank's counsel that it will not oppose the present motion.

Therefore, U.S. Bank respectfully requests that the deadlines for responding to SFR's recent filing be extended from March 19, 2018 to April 18, 2018.

27 ///

28 ///

Snell & Wilmer

	5
	6
	5 6 7 8
	8
	9
	10
	11
100	12
7, Suite 1	13
LAW OFFICES LAW OFFICES Las Vegas, Nevada 89169 702.784.5200	14
LAW OFFICES I Hughes Parkwa Vegas, Nevada 8 702.784.5200	15
Howard Las	16
3883	17
	18
	19
	20
	21
	22

23

24

25

26

27

28

1

2

3

4

CONCLUSION

Based on the foregoing, U.S. Bank respectfully requests that the Court grant its Unopposed Motion to Extend Time such that (1) the deadline for U.S. Bank to reply to SFR's Response [ECF No. 39] is April 18, 2018; and (2) the deadline for U.S. Bank to respond to SFR's Counter Motion [ECF No. 40] is also April 18, 2018.

DATED this 14th day of March, 2018.

SNELL & WILMER L.L.P.

By: /s/ Adam Tully

Robin E. Perkins, Esq. (NV Bar No. 9891) Adam Tully, Esq. (NV Bar No. 13601) 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169

Telephone: (702) 784-5200 Facsimile: (702) 784-5252

Attorneys for U.S. Bank National Association

<u>ORDER</u>

IT IS SO ORDERED.

RICHARD F. BOULWARE, II United States District Court

DATED this 30th day of March, 2018.

Snell & Wilmer

LAW OFFICES 883 Howard Hughes Parkway, Suite 1100 Las Vegas, Nevada 89169 702.784.5200

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: March 14, 2018

/s/ Lyndsey Luxford
An Employee of Snell & Wilmer L.L.P.

4823-0290-4159